

**REMARKS**

Favorable reconsideration of this application, in light of the following discussion and in view of the present amendment, is respectfully requested.

Claims 1-75 are pending in the present amendment. Claims 29, 30, 32, 33, 44, 50-53, 61, 62, 64 and 65 are amended by the present amendment.

**I. Rejection under 35 USC § 103**

Claims 1-75 were rejected under 35 USC § 103(a) as unpatentable over U.S. Patent number 6,335,927 to Elliott and U.S. Patent number 6,363,411 to Dugan. This rejection is respectfully traversed because neither Elliott nor Dugan, singly or in combination, discuss or suggest a generic service request format which is generic to a plurality of services having a plurality of vendors or version numbers, as in the independent claims.

Elliott discusses routing "telephone calls, data and other multimedia information" through a hybrid network, in which users "control network activities from a central site" (see the Abstract of Elliott). Dugan describes a "centralized administration system" that stores "reusable business data objects" (see the Abstract of Dugan). Elliott in view of Dugan discusses centralized control of network activities employing reusable data objects. However, neither Elliott nor Dugan alone or combined discuss the features of the independent claims.

Independent claim 1 is directed to a computer-implemented method for activating a service in a network, including "receiving a service order having one or more service components with each component being in a generic format." The generic service request format "is generic to a plurality of services having a plurality of vendors or version numbers." Independent claims 24, 29, 44, 48, 49 53-55 and 61 recite similar features.

As an advantage of the present invention, in a non-limiting example, it is not necessary to maintain vendor specific commands, configuration parameters names, values, etc. Also, a service order having service components in a generic format are insulated from the details, require user knowledge, and storage requirements otherwise necessitated by differing device-level management protocols (see the specification at page 25, lines 13-17).

In contrast, Elliott at col. 45, lines 15-26 merely discusses an "ISP service management layer" which "provides a manager(s) that interacts with the agents in the NLMs." It is respectfully submitted that the "ISP service management layer" of Elliott does not discuss or suggest at least "receiving a service order having one or more service components with each component being in a generic format," in which the generic service request format "is generic to a plurality of services having a plurality of vendors or version numbers," as in the independent claims. Rather, the "ISP service management layer" of Elliott relates only to a system for customers of an internet service provider "to monitor and control their services" (see Elliott at col. 45, lines 18-20), but does not discuss at least "services having a plurality of vendors or version numbers," as in the pending independent claims. In further contrast, Elliott only discusses services of a single ISP, which inherently has only one vendor and version number, not "a plurality of vendors or version numbers" as in the independent claims.

Moreover, Dugan only discusses a "centralized administration system" that "stores reusable business data objects," but also does not teach or suggest the features of the pending independent claims. Accordingly, it is respectfully submitted independent claims 1, 24, 29, 44, 48, 49, 53-55 and 61 and each of the claims depending therefrom patentably distinguish over Elliott and Dugan.

Further, the depending claims even further distinguish over the applied art. For example, claim 9 includes features of command composing which "allows more vendor specific details to be encoded in the object network resulting in a simpler element management system." In contrast, Dugan at col. 35, lines 51-67 only discusses a "service arbitration class" which "codifies the mediation of service conflicts and service interactions," but does not or suggest encoding vendor specific details in an object network. Elliott also does not teach or suggest such features.

Accordingly, it is respectfully submitted the dependent claims are also allowable for at least these reasons and for the reasons discussed regarding the independent claims from which they depend.

## **II. Amendment to claims 29, 30, 32, 33, 44, 61, 62, 64 and 65**

In addition, claims 29, 30, 32, 33, 44, 50-53, 61, 62, 64 and 65 are amended only to correct minor informalities. It is believed no new matter is added.

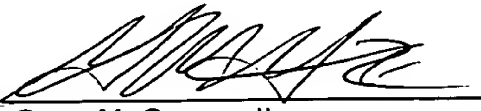
**III. Conclusion**

In light of the above discussion, and in view of the present amendment, this application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

Date: April 19, 2004

By:   
Gene M. Garner, II  
Registration No. 34,172